

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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March 7, 2025

**Via ECF**

The Hon. Gary Stein, U.S.M.J.  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

**MEMO ENDORSED**

Re: *Espiritu v. JP Cleaning & Maintenance Service Inc. et al*  
**Case No.: 1:23-cv-05877-JGK**

Dear Honorable Magistrate Judge Stein:

This law firm represents Plaintiff Noel Espiritu (the “Plaintiff”) in the above-referenced matter.

The instant letter respectfully serves to request a one (1) week extension of time for the parties to file a status report in the above-referenced action.

The basis for this request is that the parties require additional time to meet-and-confer, to finalize deposition dates in the above-referenced action.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi  
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*Attorneys for Plaintiff*

VIA ECF: All Counsel

Application granted. The deadline for the parties to submit a joint letter confirming that depositions have been scheduled is hereby extended to March 14, 2025. The parties are advised, however, that the Court is unlikely to grant an extension of the March 31, 2025 discovery deadline absent compelling circumstances.

Date: March 11, 2025  
New York, NY

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**SO ORDERED:**



**HON. GARY STEIN**  
**UNITED STATES MAGISTRATE JUDGE**